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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

October 27, 1993

HAND DELIVER

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

Dear Mr. Caton:

On behalf of Capital Cities/ABC, Inc., transmitted herewith for filing with the Commission are an original and five copies of its Reply Comments in PR Docket No. 93-199.

If there are any questions in connection with the foregoing, please contact the undersigned.

Sincerely yours,

Roger Goodspeed

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Enclosures

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)

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Amendment of Part 87 of the)
Commission's Rules to implement)
technical requirements applicable)
to instrument landing system)
receivers and VHF Omnidirectional)
radio receivers adopted by the)
International Civil Aviation)
Organization)

PR Docket No. 93-199

REPLY COMMENTS OF CAPITAL CITIES/ABC, INC.

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Kenneth J. Brown
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Broadcast Operations & Engineering

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PR Docket No. 93-199

To: The Commission

REPLY COMMENTS OF CAPITAL CITIES/ABC, INC.

Capital Cities/ABC, Inc. ("Capital Cities/ABC") submits these Reply Comments in response to the Commission's Notice of Proposed Rulemaking ("Notice"), released July 14, 1993, concerning the adoption of technical standards for Instrument Landing System ("ILS") and VHF Omnirange Radio ("VOR") receivers as established by the International Civil Aviation Organization ("ICAO") in order to improve the compatibility between the FM broadcast and the aeronautical mobile services.

Capital Cities/ABC is the owner and operator of nine FM radio stations in major markets around the United States. We submit these reply comments, endorsing the Commission's proposal in the Notice, because the proposed standards would

allocate the burden of avoiding interference between ILS and VOR systems and the FM broadcast system -- currently borne entirely by the broadcasters -- more properly between the two systems by requiring that the aeronautical receivers meet the ICAO standard.

Contrary to the comments by the aeronautic hardware industry -- claiming that the imposition of the ICAO receiver standard is a sudden, unexpected and unfair change¹ -- the Commission's proposal represents a timely and deliberate response to the ICAO standard that was first studied in 1979 and promulgated in 1985. See Notice, paragraphs 2, 3. Further, we concur with the Association of Federal Communications Consulting Engineers ("AFCCE") that costs need not be as high as claimed by fearful aircraft operators because we believe that many radios can be retrofitted with filters to improve rejection of unwanted signals.² This is a technique with which our industry is long familiar and which works well. Many broadcast, broadcast auxiliary, and land mobile operations would be simply impossible, especially in major urban areas, without such filtering. Proper receiver filtering, as an important part of proper receiver design, can create a safe, properly functioning system minimizing

¹ See, e.g., Comments of Terra Avionics, dated Sept. 16, 1993; Comments of the General Aviation Manufacturers Association, dated Sept. 27, 1993, paragraph 3; Comments of the Aircraft Owners and Pilots Association, dated Sept. 27, 1993, at 1, 3.

² See Comments of AFCCE, dated Sept. 27, 1993, paragraph 5.

interference between aeronautic and broadcast transmissions without undue burden on the aeronautic community.

Finally, the Commission's proposal to observe the ICAO timeframe is very important. As other countries implement the ICAO requirements, they will likely introduce new technologies and transmission authorizations without concern for interference to substandard airborne receivers. In this country, the FAA has recently sought to regulate other radiating technologies to protect users of low-standard aeronautic receivers. Continuing that course of action could hurt this nation's competitiveness in future technologies.

The goal of eliminating interference between broadcast and aeronautic transmissions is essentially a safety issue. Increased safety in domestic flight operations is plainly in the public interest, but it is also a particular commercial benefit to the aeronautic industry, some of whose voices have been raised in this proceeding against the imposition of the ICAO standards. But the failure to adopt the ICAO standards would seriously and unfairly burden the FM broadcast service -- a community that has historically borne at least its fair share of the burden of avoiding interference -- for no other reason but to maintain the status quo in the aeronautic industry.

Conclusion

For the reasons set forth above, Capital Cities/ABC endorses the Commission's proposal as set forth in the Notice to adopt the technical standards promulgated and adopted by the ICAO applicable to ILS and VOR receivers.

Respectfully submitted,

By:



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